

THE HON. RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON at TACOMA

ARTHA ENMAN

Plaintiff,

vs.

AGRISHOP, INC., A WASHINGTON
CORPORATION

Defendants.

Cause No.: 3:10-cv-05729 RBL

**JOINT STATUS REPORT AND
DISCOVERY PLAN**

1. **Nature and complexity of the case:** This is an employment discrimination case. This case is of average complexity for a discrimination case.
2. **The results of the FRCP 26(f) conference:** Parties agreed to act in good faith and cooperate in discovery.
3. **Deadline for joining additional parties:** January 30, 2011
4. **Method of ADR to be used:** Standard 39.1 Mediation.
5. **When ADR will be held:** 90 days before trial or earlier upon agreement of Parties.
6. **Proposed Discovery Plan:**

a. The date the FRCP 26 conference was held and when the initial disclosures will be filed: FRCP 26 conference was held December 2, 2010 and initial disclosures are to be filed by December 29, 2010.

b. Discovery subjects needed and whether discovery should be conducted in phases or be limited to or focused upon particular issues: Fact and damage discovery under the Federal Rules of Civil Procedure.

c. What changes should be made or limitations imposed regarding discovery: None, other than expert disclosures be staggered with the Defendant's disclosure to follow thirty days after the Plaintiff's expert disclosure.

d. How will discovery be managed: Parties agree to cooperate and act in good faith.

e. Any other orders that should be entered: None contemplated at this time.

7. **The date by which discovery can be completed:** 60 days before date assigned for trial.

8. **Whether the case should be bifurcated (liability issues):** No

9. **Whether the pretrial statements and pretrial order should be dispensed:** No

10. **Suggestions for shortening or simplifying the case:** None at this time

11. **The date the case will be ready for trial:** On or after, November 15, 2011.

12. **Jury Demand:** Yes

13. **Number of days needed for trial:** 5 days.

14. **Counsel Advise the Court of the following conflict dates after January 5, 2011:**

Plaintiff's Conflict Dates: February 14, 2011 through March 11, 2011; April through June 24, 2011; June 27, 2011 through July 15, 2011; August 29, 2011 through September 30, 2011;

Defendants Conflict Dates: February 14, 2010 through March 7, 2011; March 21 through March 25, 2011; April 11, 2011 through April 25, 2011; May 2, 2011 through June 2, 2011; July 11, 2011 through August 14, 2011; September 12, 2011 through September 23, 2011; October 24, 2011 through November 4, 2011; and November 11, 2011 through November 28, 2011.

15. Have all parties been served? Yes.

DATED this 22nd day of December, 2010.

KRAM, JOHNSON, WOOSTER
& MCLAUGHLIN, P.S.

/s Richard H. Wooster

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